



RE: Lewis vs. ASR -- punitive damages instruction

Nathaniel K. Charny

to:

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04/22/2018 05:45 PM

Cc:

Lauren Fenton-Valdivia, "Michael T. Hensley", Megan Goddard

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From: "Nathaniel K. Charny" <ncharny@charnywheeler.com>

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<MHensley@bressler.com>, Megan Goddard <megan@goddardlawnyc.com>

History: This message has been forwarded.

Mr. Taronji. Please pass along the following message to the Court. Thank you.

Judge Kelly:

Regarding the punitive damages instruction, Plaintiff requests that the Court's draft be used. Defendants' decision not to submit a proposed charge until mid-trial warrants greater deference to the Court's charge as drafted and it accurately and comprehensively states that law on punitive damages.

Plaintiff also stands by the representation made in Court that the Mayo-Coleman charge, without alteration, is also acceptable.

Additionally, please accept my apologies for this late email.

Thank you for your attention.

Nathaniel Charny